



U.S. Department of Justice

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February 16, 2021

The Honorable John Michael Vazquez
United States District Judge
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: **United States v. Joseph Gooch; Case No. 18-cr-313**
Sentencing Hearing Date: March 18, 2021, at 2:00
p.m.

Dear Judge Vazquez:

The parties have met and conferred regarding the upcoming sentencing hearing in this matter. Stacy Biancamano, Esq., counsel for defendant Joseph Gooch ("Defendant") has advised that Defendant consents, after consulting with counsel, to conducting the upcoming sentencing hearing scheduled for March 18, 2021, at 2:00 p.m. by videoconferencing.

The parties agree that the hearing cannot be further delayed without serious harm to the interests of justice, for the following reasons:

1. The Court has advised in Standing Order 2020-06 that court proceedings cannot be conducted in person without seriously jeopardizing the public health and safety.
2. Given that in-person proceedings cannot be conducted safely, proceeding remotely at this time will allow Defendant to obtain a speedy resolution of his case to afford appropriate punishment and

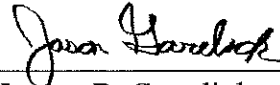
rehabilitation. Defendant has asked for this case to be resolved via a timely sentencing.

3. Proceeding as scheduled will also permit the Government to obtain a resolution of the case so that the Government, already operating in a restricted capacity due to the emergency, may appropriately focus its resources on other, emerging criminal matters. The Government has asked for this case to be resolved at the upcoming timely sentencing hearing.

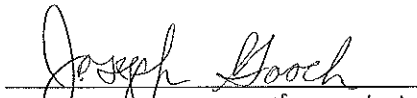
The parties believe the reasons set forth above provide a sufficient basis to proceed with the sentencing hearing on March 18, 2021 via videoconferencing. Thank you for your consideration of this matter.

Respectfully submitted,

RACHAEL A. HONIG
Acting United States Attorney

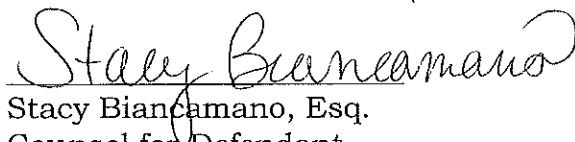


By: Jason P. Garelick
Special Assistant U.S. Attorney



Joseph Gooch
Defendant

Signed by Counsel w/ client's consent



Stacy Biancamano, Esq.
Counsel for Defendant